

# Exhibit 4

**From:** Gadeir Abbas  
**To:** [Powell, Amy \(CIV\)](#); [Roth, Dena M. \(CIV\)](#); [Konkoly, Antonia \(CIV\)](#)  
**Cc:** [Ahmed Mohamed](#); [Jack Cooper](#); [Lena F. Masri, Esq.](#)  
**Subject:** Meet and Confer Request re Motion for Extension of All Discovery Deadlines  
**Date:** Wednesday, January 03, 2018 10:59:39 PM

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Amy,

During our meet and confer last week, we discussed the possibility that the plaintiffs would seek a motion for extension of all discovery deadlines and you indicated that defendants' position is that such a motion would be premature. At this time, we disagree, will seek an extension, and we email for the purposes of conferring in compliance with local rules.

We will seek a motion for an extension of all discovery deadlines for 60 days, factoring in the time it will take you all to assert the state secrets privilege in response to our forthcoming motion to compel on your document requests. We will certainly be seeking documents and parts of documents you claim to be state secrets.

Based on our review of your production thus far, last week's meet and confer, and our ongoing efforts to resolve issues related to the RFA's -- plaintiffs will seek an extension of all discovery deadlines. In particular, plaintiffs will ask that expert discovery occur only after privilege issues are litigated and resolved and production/depositions get completed in accordance with how the court rules.

We can't depose the FBI, TSC, and TSA on key topics until we have all the responsive documents that the government is currently holding back on the basis of various privilege assertions. We also can't undertake the expert work we need without having access to basic information, such as the Selectee List's inclusion standard among other foundational information regarding how the watchlist actually works.

Please advise when we can have our meet and confer tomorrow. We will file and notice for 1/12.

Regards,

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**Senior Litigation Attorney**

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